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July 29, 2024

Via PACER/ECF

The Honorable Rukhsanah L. Singh, U.S.M.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Courtroom 7W
Trenton, New Jersey

Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Product Liability Litig.*, Case No. 3:16-md-2738 (MAS)/(RLS)

Dear Judge Singh:

Our Firm represents Beasley Allen and Andy D. Birchfield, Jr., Esq. (together “Beasley Allen”) in the pending Motion to Disqualify before the Court. *See* ECF No. 28760. On July 19, 2024, the Court ordered the parties to the Motion to show cause “why this Court should not adopt the State MCL’s findings of facts and conclusions of law.” *See* ECF No. 32984. Beasley Allen respectfully submits that the State MCL’s findings of fact and conclusions of law should be adopted by this Court as they are consistent with and supported by Supreme Court of New Jersey precedent, the New Jersey Rules of Professional Conduct, and the testimony and evidence presented before Your Honor and Judge Porto. As J&J has merely regurgitated the same arguments it previously raised, (and continues to do so, *see* ECF No. 33026), we stand on our Brief in Opposition of May 17, 2024 (ECF No. 32206), as well as our Plenary Brief filed on May 24, 2024 (ECF No. 32267), which both this Court and Judge Porto considered during the course of the hearings on March 25, 2024, April 10, 2024, and May 3, 2024.

Thank you for your time and attention to this matter.



The Honorable Rukhsanah L. Singh, U.S.M.J.

July 29 2024

Page 2

Respectfully submitted,

/s/ Jeffrey M. Pollock

JEFFREY M. POLLOCK

cc: All Counsel (*via* ECF)